

**EXHIBIT 2 TO COUNTERDEFENDANTS'
REQUEST FOR JUDICIAL NOTICE**

(Part 3 of 4)

1 stated herein in their entirety.

2 179. Defendants violated the common law of fraud and California Civil Code §§ 1709,
3 1710, and 1572 through the material misrepresentations and non-disclosures alleged above,
4 including the failure to truthfully respond to Plaintiff with respect to their conflicting interest and
5 position in building Nextdoor.com, Inc. only months after misappropriating confidential
6 information from Plaintiff. Defendants failed to disclose material facts concerning the creation of
7 Nextdoor.com, Inc. – a company which was conceived and created from confidential information
8 fraudulently misappropriated from Plaintiff. Through a plain reading of Gurley's own statements
9 in the email sent to all portfolio companies around October 9, 2008, Gurley directly advised Tolia
10 to adapt actions, decisions, etc. to expediently or effectively act in manners that sacrifice ethical
11 principles by being "opportunistic". (See Exhibit K). Through their fraudulent actions,
12 Defendants Harvey, Fenton, Lasky, Gurley, Cassidy, Tolia, Leary, and Norris aided and abetted
13 the other Defendants in their fraudulent conduct.

14 180. Defendants made their material misrepresentations knowing that their statements
15 were false and misleading and with the intent to defraud Plaintiff and other shareholders of
16 Fatdoor, Inc. As alleged above, Defendants conspired with one another to make the material
17 misrepresentations and acted in furtherance of their conspiracy by using those material
18 misrepresentations to illegally compete with Fatdoor, Inc.

19 181. Plaintiff and Fatdoor, Inc. relied on Defendants' material misrepresentations by
20 disclosing trade secrets, business plans, unpublished confidential patent applications, knowhow,
21 and software technologies regarding the Nextdoor/Fatdoor conception.

22 182. As a proximate result of relying on Defendants' material misrepresentations,
23 Plaintiff incurred actual damages consisting of the loss of his common shares in Fatdoor, Inc.,
24 loss of his employment with Fatdoor, Inc., and the value of the equity interests he would now
25 have had in building and contributing to the original Fatdoor, Inc. concept.

26 183. Defendants' fraudulent conduct alleged above was done intentionally, through
27 malice, fraud and oppression, with the intention of the part of the Defendants to deprive Plaintiff
28 of his common stock and legal rights and was despicable conduct that subjected Plaintiff to cruel

1 and unjust hardship in conscious disregard for Plaintiff's rights, so as to justify an award of
2 exemplary and punitive damages.

3 THIRD CAUSE OF ACTION

4 Constructive Fraud and Aiding and Abetting Constructive Fraud 5 (Against Defendants Benchmark, Nextdoor.com, Inc., Harvey, Fenton, Lasky, Gurley, 6 Cassidy, Tolia, Leary, Norris, and DOES 1 – 100)

7 184. Plaintiff realleges and incorporates by reference paragraphs 1 through 183,
8 inclusive, set forth above.

9 185. Defendants are liable to Plaintiff for constructive fraud because they aided and
10 abetted the other Defendants in their concealment of material facts concerning the business
11 operations of Defendant Benchmark. Defendant Benchmark, through its partners and EIRs,
12 actively supported, encouraged, aided and abetted other Defendants and actively participated in
13 constructive fraud and concealing material information concerning their intentions to
14 misappropriate Fatdoor Inc.'s confidential information in the guise of using that information to
15 conduct potential pre-investment due diligence but instead created a similar company of their own
16 – Nextdoor.com, Inc. Through a plain reading of Defendant Gurley's own statements in the email
17 sent to all portfolio companies around October 9, 2008, Defendant Gurley directly advised
18 Defendant Tolia to adapt actions, decisions, and to expediently or effectively act in manners that
19 would sacrifice ethical principles by being "opportunistic." (See Exhibit K).

20 186. As a proximate result of relying on Defendants' material constructive fraud,
21 Plaintiff incurred actual damages consisting of the loss of his common shares in Fatdoor, Inc.,
22 loss of his employment in Fatdoor, Inc., and the value of the equity interests they would have now
23 had in building and contributing to the original Fatdoor, Inc. concept. In addition, Plaintiff has
24 suffered losses, the exact amount of which will be proven at the time of trial.

25 187. Defendants' constructively fraudulent conduct alleged above was done
26 intentionally, through malice, fraud and oppression, with the intention of the part of the
27 Defendants to deprive Plaintiff of his common stock and legal rights and was despicable conduct
28 that subjected to Plaintiff to cruel and unjust hardship in conscious disregard for Plaintiff's rights,
so as to justify an award of exemplary and punitive damages.

FOURTH CAUSE OF ACTION

Negligent Interference with Existing and Prospective Economic Advantage
(Against Defendants Benchmark, Harvey, Fenton, Lasky, Gurley, Taylor, Cassidy, Norris,
and DOES 1-100)

188. Plaintiff incorporates the allegations made in Paragraph 1 through 187 as if stated herein in their entirety.

189. Prior to engaging in the aforementioned conduct, Defendants were fully aware that Plaintiff had business relationships with numerous other investors, venture capitalists, and parties interested in Plaintiff's confidential business ideas and novel inventions. Plaintiff had a contractual relationship with Fatdoor, Inc. and a prospective relationship advantageous to Plaintiff with several other parties, as mentioned above.

190. Plaintiff is informed and believes and thereon alleges that, in addition to the relationship between Plaintiff and Defendant Benchmark, Defendant Benchmark and the Benchmark partners mentioned herein also had a parallel and illicit relationship with Defendants Tolia, Leary, Janakiraman, Taylor, and Norris. The conduct of Defendants as described above was designed to wrongfully disrupt the economic relationships between Plaintiff, Fatdoor, Inc., and its clients, and indeed, the relationships were disrupted as a result of Defendants' actions. Indeed, Defendants owed a duty of care to Plaintiff to maintain the information mentioned herein in the utmost confidence. There was a special relationship between Plaintiff and Defendants.

191. In addition, Plaintiff had established relationships with numerous clients and businesses that were interested in Plaintiff's confidential business ideas and novel inventions to the substantial benefit of Plaintiff. Defendants knew of these relationships as a result of their pre-investment dealings with Plaintiff and through their actions, negligently interfered with Plaintiff's existing and prospective economic advantage. Defendants' wrongful conduct is independent of the interference itself and proximately caused Plaintiff's injury and damage.

192. As a result of the wrongful conduct of Defendants, Plaintiff has been damaged in an amount which will be proven at the time of trial. When Plaintiff has ascertained the full amount of his damages, he will seek leave of Court to amend this Complaint accordingly.

193. The conduct of Defendants as alleged herein was purposeful and intentional and

1 was engaged in for the purpose of depriving Plaintiff of property or legal rights or otherwise
 2 causing injury, and was despicable conduct that subject Plaintiff to cruel and unjust hardship in
 3 conscious disregard of its rights, and was performed with fraud, oppression or malice so as to
 4 justify an award of exemplary or punitive damages against Defendants, the exact amount of
 5 which will be proven at the time of trial.

6 **FIFTH CAUSE OF ACTION**

7 **Breach of Confidence**

8 **(Against Defendants Benchmark, Harvey, Fenton, Lasky, Gurley, Taylor, Cassidy,
 Hoffman, Norris and DOES 1 – 100)**

9
 10 194. Plaintiff incorporates the allegations made in Paragraph 1 through 193 as if stated
 11 herein in their entirety.

12 195. Plaintiff conveyed to Defendants his business ideas and inventions related to the
 13 Fatdoor/Nextdoor concept, which were confidential and novel.

14 196. Defendants knew that Plaintiff's business ideas and inventions were disclosed to
 15 them in confidence.

16 197. There was an understanding between Plaintiff and Defendants that such
 17 confidence should be maintained.

18 198. Defendants opportunistically misappropriated and used Plaintiff's business ideas
 19 and inventions in violation of such understanding.

20 199. Defendants violated such understanding knowingly and willfully.

21 200. As a direct and proximate result of Defendants' actions alleged above, Plaintiff
 22 has no adequate legal remedy, has been irreparably injured, and has suffered monetary damages,
 23 the exact amount of which will be proven at the time of trial.

24 **SIXTH CAUSE OF ACTION**

25 **Breach of Contract**

26 **(Against Defendants Benchmark, Harvey, Fenton, Lasky, Gurley, Taylor, Cassidy, Norris
 and DOES 1 – 100)**

27 201. Plaintiff incorporates the allegations made in Paragraph 1 through 200 as if stated
 28 herein in their entirety.

202. Plaintiff and Defendants Benchmark, Harvey, Fenton, Lasky, Gurley, Taylor, Norris, and Cassidy entered into a contract on or about the summer of 2007 wherein Plaintiff supplied confidential information to these Defendants related to the Nextdoor/Fatdoor concept for the explicit purpose of conducting due diligence prior to potential investment in Fatdoor, Inc.

203. As part of the aforementioned contract, these Defendants were fully aware that Plaintiff supplied aforementioned confidential information for the explicit purpose of due diligence related to a potential investment in Fatdoor, Inc. by Defendant Benchmark.

204. As part of the aforementioned contract, Defendants explicitly represented to Plaintiff that they were not developing a company similar to the Nextdoor/Fatdoor concept, and even cleared all conflicts of interest in writing.

205. Plaintiff performed all the conditions, covenants, and promises of the aforementioned contract in accordance with the terms and conditions of the oral contract by supplying Defendant Benchmark and other Defendants with confidential information regarding Nextdoor/Fatdoor and requested by Defendant Benchmark and other Defendants explicitly for pre-investment due diligence purposes.

206. Defendants breached the agreement with Plaintiff by misappropriating the confidential information supplied by Plaintiff and funded Nextdoor.com, Inc. with the confidential information opportunistically misappropriated from Plaintiff despite explicitly stating to Plaintiff, as a part of the agreement, that it was not developing a company similar to Plaintiff's company.

207. Defendants therefore breached their contract with Plaintiff, who has been damaged monetarily, the exact amount of which will be proven at the time of trial.

SEVENTH CAUSE OF ACTION

Breach of Implied Covenant of Good Faith & Fair Dealing
(Against Defendants Benchmark, Harvey, Fenton, Lasky, Gurley, Taylor, Cassidy, Norris and DOES 1 – 100)

208. Plaintiff incorporates the allegations made in Paragraph 1 through 208 as if stated herein in their entirety.

209. Plaintiff had a valid contract with Defendants that required Defendants not to

1 disclose confidential information and to use the information for the explicit purpose of due
2 diligence related to a potential investment in Fatdoor, Inc. by Defendant Benchmark.

3 210. Defendants breached the implied covenant of good faith and fair dealing by
4 misappropriating the confidential information supplied by Plaintiff and funding Nextdoor.com,
5 Inc. with the confidential information opportunistically misappropriated from Plaintiff.

6 211. Therefore, Defendants are liable for all damages proximately resulting from their
7 conduct, the exact amount of which will be proven at the time of trial.

8 **EIGHTH CAUSE OF ACTION**
9 **Negligent Misrepresentation**
10 **(Against Defendants Benchmark, Harvey, Fenton, Lasky, Gurley, Cassidy, Norris, and**
11 **DOES 1-100**

12 212. Plaintiff incorporates the allegations made in Paragraph 1 through 211 as if stated
13 herein in their entirety.

14 213. Defendants made untrue representations as to a material fact. Defendants
15 represented to Plaintiff that the information Plaintiff supplied Defendants would only be used for
16 due diligence related to Defendant Benchmark's potential investment in Fatdoor, Inc.

17 214. Defendants made this false representation without any reasonable ground for
18 believing it to be true evidenced by the fact that Defendants Tolia and Leary, the current Co-
19 Founders of Nextdoor.com, Inc. were secret EIRs at Defendant Benchmark during the same time
20 this false representation was made to Plaintiff.

21 215. Defendants made this false representation with the intent to induce Plaintiff to act
22 in reliance on it. Indeed, Plaintiff ended up giving Defendants all confidential information related
23 to the Nextdoor concept, including presentations, unpublished patent applications, technical
24 information and all other confidential information described herein, including the Executive
25 Summary.

26 216. Plaintiff relied on Defendants' false representation and Plaintiff's reliance was
27 justified because Plaintiff was looking for funding for his company, Fatdoor, Inc.

28 217. Plaintiff has suffered damages, in an amount to be proven at trial, due to his
reliance on Defendants' false representations.

NINTH CAUSE OF ACTION
Tortious Interference with Contract
(Against Defendants Benchmark, Harvey, Fenton, Lasky, Gurley, and DOES 1-100)

218. Plaintiff incorporates by reference paragraphs 1 through 217, inclusive, set forth above.

219. A valid employment contract existed between Plaintiff and Fatdoor, Inc. Plaintiff was the CEO of Founder and CEO of Fatdoor, Inc. and had created tremendous shareholder value for the company.

220. Defendants knew of the existence of the employment contract between Plaintiff and Fatdoor, Inc. at the time of the interference.

221. Defendants intended to induce a breach of this employment contract. Defendants recommended that Plaintiff be fired as CEO of Fatdoor, Inc. and even referred a headhunter, Love, to find a replacement for Plaintiff.

222. As a result of Defendants' conduct, Fatdoor, Inc. terminated Plaintiff's employment as CEO, as mentioned in this First Amended Complaint.

223. Therefore, Defendants are liable for all damages proximately resulting from their conduct, the exact amount of which will be proven at the time of trial.

TENTH CAUSE OF ACTION
Unjust Enrichment
(Against all Defendants and DOES 1-100)

224. Plaintiff incorporates by reference paragraphs 1 through 223, inclusive, set forth above.

225. Defendants did in fact receive, obtain and/or gain the use and/or possession of such assets and intellectual property of Plaintiff and Fatdoor, Inc. as referenced in this First Amended Complaint.

226. Defendants would be unjustly enriched if they were to retain and/or realize the benefit of said assets and intellectual property without compensating Plaintiff for the fair value thereof.

227. Plaintiff is entitled to restitution and declaratory relief.

228. Defendants' wrongful acts and omission in commission and furtherance of their aforesaid unjust enrichment which are attributable to Defendants as aforesaid, were engaged in willfully, wantonly and deliberately, and with the intent to cause damage to Plaintiff or with reckless disregard of the substantial likelihood that Plaintiff would suffer and incur damages thereby, and as such were so outrageous and shocking to the conscience that the imposition of punitive damages upon Defendants is warranted.

ELEVENTH CAUSE OF ACTION
Unfair Business Acts and Practices in Violation of Business and Professions Code § 17200
(Against Defendants Benchmark, Nextdoor.com, Inc., Harvey, Fenton, Lasky, Gurley,
Tolia, Leary, Janakiraman, and DOES 1-100

229. Plaintiff incorporates by reference paragraphs 1 through 228, inclusive, set forth above.

230. Plaintiff is informed and believes and thereon alleges that, at all times herein mentioned, Defendants Tolia, Janakiraman, and Leary were agents of Defendant Benchmark and, in doing the things herein alleged, were acting in the scope of such agency and with the permission and consent of Defendant Benchmark.

231. Beginning on or about June 15, 2007, Defendant Benchmark and its partners and EIRs named herein were privy to Plaintiff's business methods, plans, and concepts as to Nextdoor/Fatdoor and geospatial localization technologies.

232. Defendant Benchmark, on or about July 27, 2007, recommended to the Board of Fatdoor, Inc. that the company move away from neighborhood-based technologies and business.

233. On information and belief, on or about August 15, 2007, Plaintiff was terminated from Fatdoor Inc. based on the guidance of a headhunter and recruiter recommended to the board of Fatdoor Inc. by Defendant Benchmark.

234. On information and belief, on or about October 26, 2011 a new neighborhood-based startup website "Nextdoor.com" was launched based substantially on Plaintiff's business methods, plans, and concepts as to Nextdoor/Fatdoor and geospatial localization technologies. On information and belief, Defendant Benchmark is one of the primary financiers of said startup.

235. As a direct, proximate, and foreseeable result of Defendants' wrongful conduct, as

1 alleged above. Plaintiff was subject to loss of employment, loss of his common shares in Fatdoor
 2 Inc., and loss of contributory equity interests to the original Fatdoor, Inc. concept. Plaintiff is
 3 entitled to relief, including full restitution and/or disgorgement of all revenues, earnings, profits,
 4 compensation, and benefits which may have been obtained by Defendant Benchmark as a result
 5 of such unfair business acts or practices.

6
 7 **TWELVETH CAUSE OF ACTION**

8 **Violations of California Corporate Securities Laws, Cal. Corp. Code §25400**
(Against Defendant Benchmark, Harvey, Fenton, Lasky, Gurley, and DOES 1-100)

9 236. Plaintiff incorporates by reference paragraphs 1 through 235, inclusive, set forth
 10 above.

11 237. Defendant Benchmark, by engaging in the conduct described above, induced the
 12 sale of a security in the state of California by means of both written and oral communications
 13 which included an untrue statement of material fact and omitted to state material facts necessary
 14 in order to make the statements made, in light of the circumstances under which they were made,
 15 not misleading.

16 238. As a proximate result of the fraudulent conduct of Defendant as herein alleged,
 17 Plaintiff has incurred damages in that Plaintiff was induced, in conjunction with other common
 18 shareholders of Fatdoor, Inc., to take on alternate investments from Norwest and alter the
 19 designation of Plaintiff's vested shares from unrestricted to restricted, all by reason of which
 20 Plaintiff has been damaged in at least the sum in excess of the jurisdictional amount of this Court
 21 and additional amounts according to proof at time of trial, including interest, attorneys' fees and
 22 costs.

23 239. The aforementioned conduct of Defendant was an intentional misrepresentation,
 24 deceit, or concealment of a material fact known to Defendant with the intention on the part of
 25 Defendant of thereby depriving Plaintiff of property or legal rights or otherwise causing injury,
 26 and was despicable conduct that subjected Plaintiff to unjust hardship and conscious disregard of
 27 Plaintiff's rights, so as to justify an award of exemplary and punitive damages.

EXHIBIT 2c TO WALIA DECLARATION

THIRTEENTH CAUSE OF ACTION**Conversion**
(Against all Defendants)

240. Plaintiff incorporates by reference paragraphs 1 through 239, inclusive, set forth above.

241. Plaintiff had a right to possess the fruits of his ideas and inventions and the right to build and grow Fatdoor, Inc. into the Nextdoor/Fatdoor concept envisioned, developed, and invented by Plaintiff.

242. Defendants converted Plaintiff's possession by their wrongful acts mentioned in great detail herein. Defendants fraudulently convinced Fatdoor, Inc., its Board of Directors and its management that the Nextdoor/Fatdoor concept that Plaintiff developed was not going to work and essentially pushed the company in a different, less profitable direction. At the same time, Defendants had the intention to opportunistically steal and pursue the Nextdoor/Fatdoor concept on their own and with their own favored set of Founders as evidenced by the formation of Round Two, Inc. in late 2007. Plaintiff was entitled to his creation at the time of conversion by Defendants.

243. Defendants wrongfully disposed Plaintiff of his inventions and ideas and Plaintiff's ability and intention to build on what Plaintiff had already created (i.e., the Nextdoor/Fatdoor concept). Defendants then converted and took Plaintiff's creation for themselves. In addition, Defendants caused Plaintiff to prematurely sell his stock in Fatdoor, Inc. and even caused Plaintiff's termination from Fatdoor, Inc. through their recommendation of a headhunter. In essence, Defendants converted and applied Plaintiff's property to their own use.

244. Plaintiff has suffered great monetary damage as a result of Defendants' conduct as detailed in this First Amended Complaint. The exact amount of damages will be proven at the time of trial.

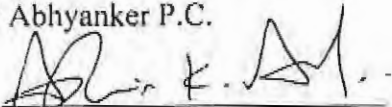
PRAYER FOR RELIEF

WHEREFORE, Plaintiff prays for judgment, jointly and severally, against Defendants, as follows:

1. Restitutionary and Compensatory damages in an amount to be proven at trial;
2. Founders equity equivalent to twenty five percent (25%) of the company Nextdoor.com, Inc., a Delaware corporation;
3. Punitive and exemplary damages based on Defendants' intentional, malicious, cruel and unjust disregard of Plaintiff's rights and interests;
4. Pre-judgment expenses, costs, attorneys' fees and such other legal and equitable relief as the Court deems appropriate.

Dated: December 6, 2011.

Raj Abhyanker P.C.

By 
Ashwin K. Anand

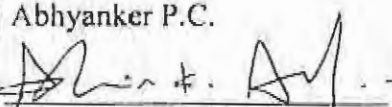
*Attorney for Plaintiff,
Raj Vasant Abhyanker*

JURY TRIAL DEMAND

Plaintiff hereby demands a jury trial for all causes of action alleged in his First Amended Complaint for which he is entitled to a trial by jury.

Dated: December 6, 2011

Raj Abhyanker P.C.

By 
Ashwin K. Anand

*Attorney for Plaintiff,
Raj Vasant Abhyanker*

SUMMARY OF EXHIBITS

EXHIBIT A	<i>Confidential Screenshots of Nextdoor, shared with Defendants at 7am on Friday June 22, 2007</i>
EXHIBIT B	<i>Confidential Disclosure Document of Nextdoor, shared with Defendants at 7am on Friday, June 22, 2007</i>
EXHIBIT C	<i>Confidential Executive Summary of Fatdoor, Inc., shared with Defendants at 7am on Friday, June 22, 2007</i>
EXHIBIT D	<i>Confidential Patent Application of Fatdoor, Inc., shared with Defendants at 7am on Friday, June 22, 2007 titled U.S. Patent Application number 2007/0218900 A1 titled "MAP BASED NEIGHBORHOOD SEARCH AND COMMUNITY CONTRIBUTION" (See Exhibit 4) on which the name "Nextdoor.com" is clearly associated as the domain name intended to be used by Fatdoor, Inc. (page 21, col. 1, paragraph [0236])</i>
EXHIBIT E	<i>VentureBeat article on Nextdoor/Fatdoor, titled "Fatdoor turns neighborhood into online social networks" May 28, 2007</i>
EXHIBIT F	<i>Mashable article on Nextdoor/Fatdoor, titled "Fatdoor launches social network for your neighborhood" May 28, 2007</i>
EXHIBIT G	<i>Wired article on Nextdoor/Fatdoor, titled "Fatdoor CEO talks about balancing security with community" May 31, 2007</i>
EXHIBIT H	<i>Mercury News article on illegal and illicit Nextdoor.com, Inc., titled "ePinions co-founder Nirov Tolia back in saddle with Facebook-like startup" October 28, 2011</i>
EXHIBIT I	<i>Wikipedia article on Bret Taylor, CTO of Facebook, formerly EIR at Benchmark Capital, formerly co-creator of Google Maps</i>
EXHIBIT J	<i>New York Times article titled "Instant Company" July 11, 1999</i>
EXHIBIT K	<i>TechCrunch article reproducing an email from Bill Gurley to portfolio companies and advising them to be "opportunistic" October 9, 2008</i>
EXHIBIT L-1	<i>April 2011 Facebook photo with named Defendants tagged together</i>
EXHIBIT L-2	<i>September 2011 Facebook photo with named Defendants tagged together</i>
EXHIBIT L-3	<i>October 2011 Facebook photo with named Defendants tagged together</i>
EXHIBIT L-4	<i>November 2011 Facebook photo with named Defendants tagged together</i>

EXHIBIT A

[Home](#) [Map & Search](#) [How to Use](#) [My Zillow](#)

[Any Homes](#)

Address OR Street OR Neighborhood City, State OR ZIP

859 Bette

Cupertino, CA

[GO](#) [Advanced Search](#)

859 Bette Ave, Cupertino, CA 95014

Get to know your neighbors!

[Home Details](#)

[Bird's Eye View](#)

[Map View](#)



RAJ AND SONAL ABHYANKER

Attorney and Pharmacist, Doctorate degrees

INTERESTS

badminton, hiking, traveling

FAMILY DESCRIPTION

has lived in cupertino for about 5 years or so raj ran for city council last year very active in community

OTHER INFO

two kids, Artha and Indira

FEEDBACK

raj sucks!
raj is awesome!

[Pictures:](#)



IMG_0187



IMG_0188



IMG_0189



LoanW
Find Today's Low
Loan Type:
Refinance
Loan Amount:
\$10,000

TARGETED
ADVERTISEMENT

eb
Rate

\$150,000

[Start Here](#)

[Shop For A Loan](#)

Internet

EXHIBIT B

NextDoor.com. Specification Draft 1 "Get to know your neighbors"

This idea is too exciting for me to wait till the middle of the night to get this to you! Let me know your feedback/questions, and please feel free to suggest improvements/ideas. Ideally, we need to get a fully functional site up in 30 days with the most basic features/functionality.



SUMMARY :

Basically, what we want to create is mixture of a social network, zillow.com, maquest, eopinions, google, and wikipedia.

What we are trying to create is a way to create a way for neighbors to get to know each other and their surrounding businesses more easily through the Internet. The UI of the site will look a bit like Zillow.com, but modified so that there will be a social networking page pop up on the right when one clicks a particular home/location. Unlike Zillow.com however, there will be no information about prices of a home, no information about the number of bedrooms of a home, etc.

People will be the focus, not the real estate. In essence, the most critical input information will be divided as follows

RESIDENTIAL LOCATION :

- (1) name of the persons/family living in that residence
- (2) Their profession if any
- (3) Their educational background if any
- (4) Their recreational interests
- (5) About their family description box
- (6) Anything else people want to post about that person including their interests, hobbies, etc. See linked.com for an idea of possible fields.
- (7) An ability for users to leave endorsements

BUSINESS LOCATION or CIVIC LOCATION (park, govt building, church, etc.) :

- (1) name of the business/location
- (2) email of the manager of the business/location
- (3) phone number of the business/location if known
- (4) anything else people want to say about the business (good or bad), contributable through a wiki.

These two will be the primary types of types. The following things will differentiate NextDoor.com from other social networks.

NEXTDOOR FEATURES LIKE ZILLOW :

1. interface driven by address like zillow
2. maps can be viewed, zoomed in on, tied to a parcel # like Zillow
3. need to license from source of zillow or similar location.
4. no home price or bedroom etc. info. Rather info about people that live in homes. Also, info about businesses unlike zillow.

NEXTDOOR FEATURES LIKE WIKIPEDIA :

1. Anyone can populate anyone's social network page.
2. Anybody can post in one of the boxes above. They can post anonymously or publicly.
3. If someone wants to override information that already has been established, they will need to have an identity (e.g., user name), to override published posting information.
4. If an owner of an entity location wishes to mark their location private, and uneditable by the public without their permission, they will need to pay nextdoor.com \$9.95 per month.

NEXTDOOR FEATURES LIKE SOCIAL NETWORK :

1. Spreads virally by users inviting their friends like a social network.
2. Every person that registers will have their own profile, but registration is not required to contribute content. Registration is required to "own" content on your own home, and have override permission to delete things that you don't like about yourself listed about you by others. To register, Nextdoor will need to confirm the user's identity and address (e.g., digital signature tool, drivers license verification, etc.), and the user will need to pay a credit card for \$9.95 per month to control their identity. They can get a rebate, and not have to pay the monthly fee for a particular month, if they invite at least 15 people that month AND contribute information about at least 10 of their neighbors, friends, civic, or business locations in their neighborhood.
3. Endorsements for neighbors by others will be published automatically.
4. People can post pics of their family, their business, their home, etc. on their profile once they 'own' their home and register.
5. People can search for other people by descriptors (e.g., name, profession, distance away from me, etc.)
6. Social network pages created on the fly, when one clicks on a home

NEXTDOOR FEATURES LIKE MAPQUEST:

1. People will be able to visually see directions to their neighborhood businesses, rather than directions through text in the first phase.
2. After time, directions can be offered as well.

NEXTDOOR FEATURES LIKE EOPINIONS:

1. People can leave their opinions on businesses like epinions, but in addition, can leave opinions on neighbors.

NEXTDOOR FEATURES LIKE GOOGLE:

1. People can search for things they want e.g. nearby pizzas etc. by distance away.
2. Advertisers can 'own' their listing by placing a display ad on nextdoor.com. Instead of click through revenues when someone leaves the site, revenues will be when the link is clicked and someone views the preview html on the right of the visual map.
3. Targeted advertisements placed when someone searches a particular street, name, city, etc. (like adwords).

OTHER FEATURES :

1. Apartment, building, condo creation wiki - people can create floors, layout, etc. of their building, and add social network pages on the fly when they click on a location that has multiple residents, tenants, or lessees.
2. UI should be clean, simple, and uncluttered. Simple message of "get to know your neighbors". Map shows neighbors. Focus on user experience. Don't have about us, etc. easily accessible on page. Make sure compelling message to invite friends others to join.

EXHIBIT C

fatdoor ecosystem

(findings from Cupertino launch)



- What kind of neighbors
- Market and find homes



Cupertino Chamber of Commerce
Your Partner in Silicon Valley

- Local Business networking
- Community advertising



BLOCK WATCH®

- Neighbor-Neighbor talk
- Group-access street cameras

Commerce



- Member networking
- Volunteer recruitment



Civic



fatdoor
get to know your neighbors



Service



- Parent communication
- Babysitting groups

Government



- Speaker recruitment
- Member recruitment



- Campaigning
- Citizen government'

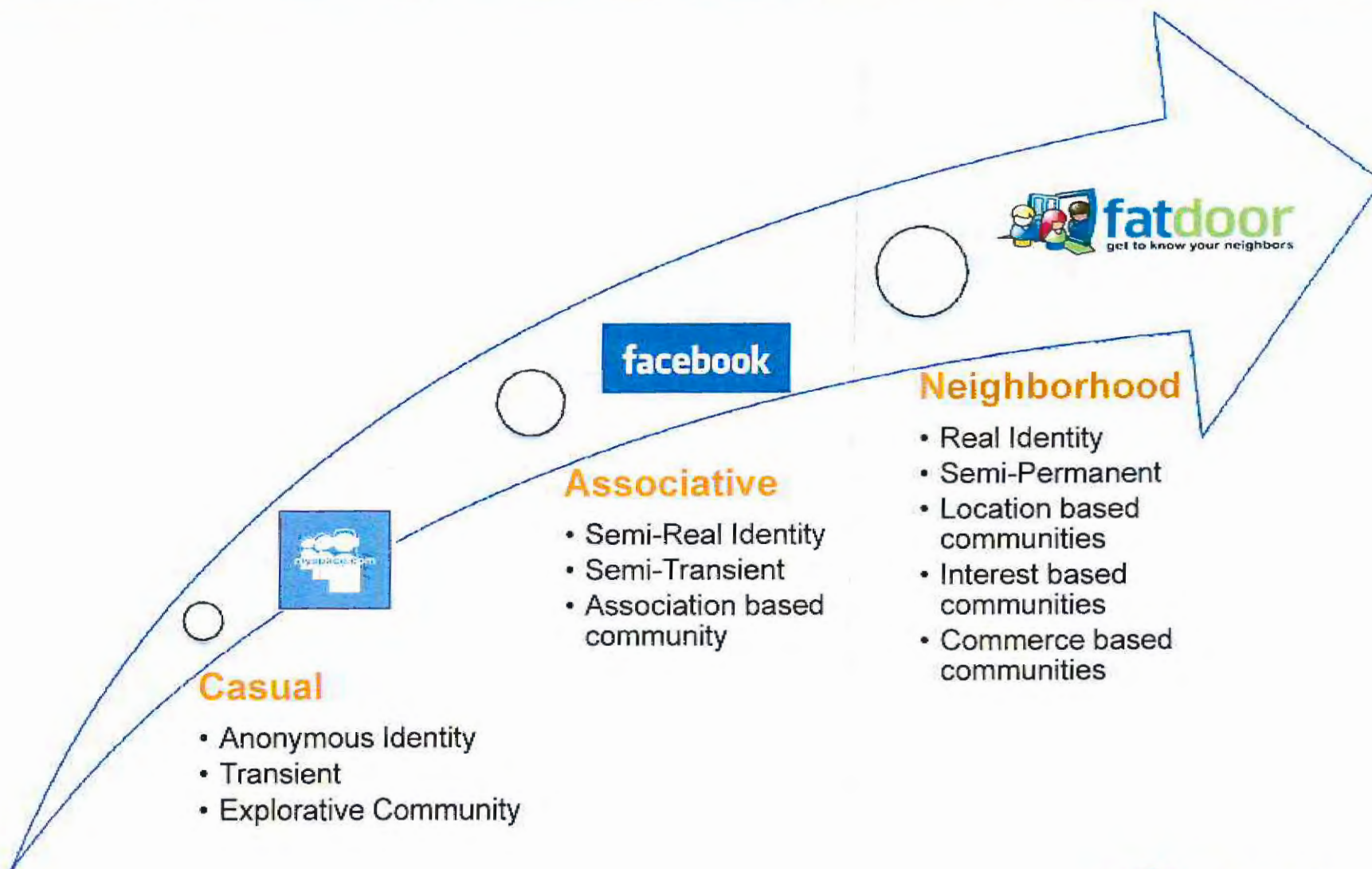


- Veterans Memorial
- Fundraising

Confidential Material



Maturing Networks



Confidential Material

EXHIBIT D



US 20070218900A1

(19) **United States**(12) **Patent Application Publication**
Abhyanker(10) **Pub. No.: US 2007/0218900 A1**(43) **Pub. Date: Sep. 20, 2007**(54) **MAP BASED NEIGHBORHOOD SEARCH
AND COMMUNITY CONTRIBUTION**

60/853,499, filed on Oct. 19, 2006, provisional application No. 60/854,230, filed on Oct. 25, 2006.

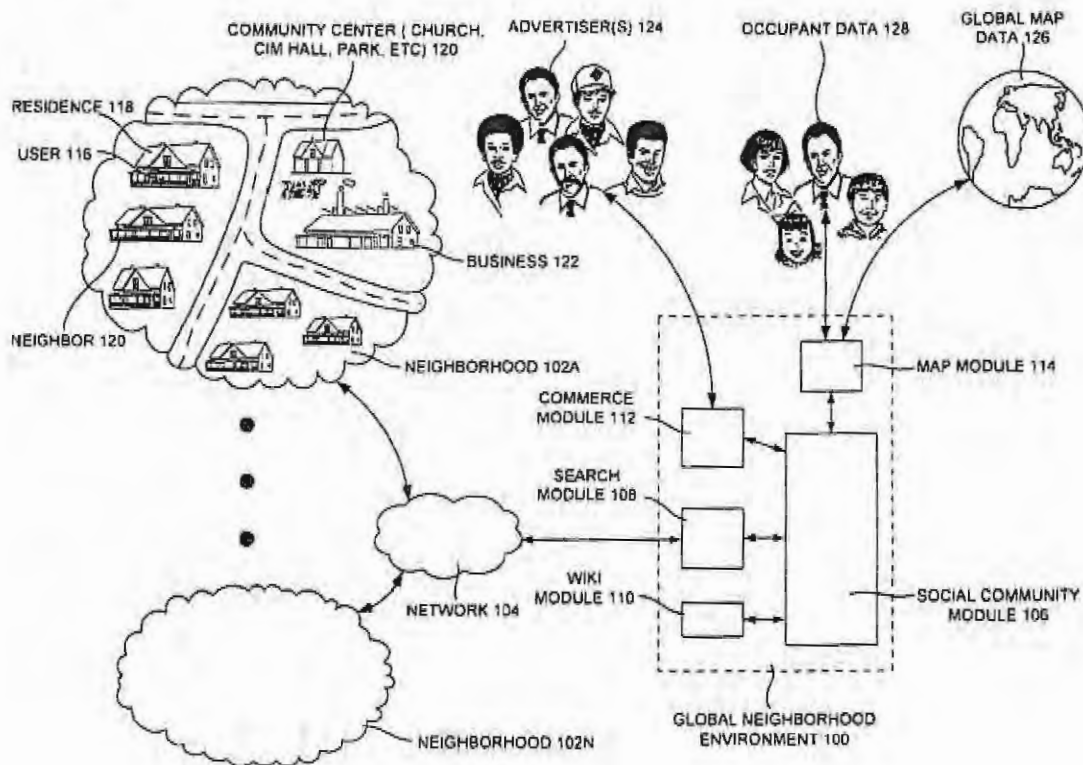
(76) **Inventor:** **Raj Vasant Abhyanker,**
Cupertino, CA (US)**Publication Classification**(51) **Int. Cl.**
H04M 11/04 (2006.01)(52) **U.S. Cl.** 455/435.1; 455/404.2(57) **ABSTRACT**

A method, apparatus and system of map based community search and neighborhood contribution are disclosed. In one embodiment, a method includes associating a verified registered user with a user profile, associating the user profile with a specific geographic location, generating a map concurrently displaying the user profile and the specific geographic location and simultaneously generating, in the map, wiki profiles associated with different geographic locations surrounding the specific geographic location associated with the user profile.

Correspondence Address:
Raj Abhyanker, LLP
c/o Intellevate
P.O. Box 52050
Minneapolis, MN 55402

(21) **Appl. No.:** 11/603,442(22) **Filed:** Nov. 22, 2006**Related U.S. Application Data**

(60) Provisional application No. 60/783,226, filed on Mar. 17, 2006, provisional application No. 60/817,470, filed on Jun. 28, 2006, provisional application No.



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MAP BASED NEIGHBORHOOD SEARCH AND COMMUNITY CONTRIBUTION

CLAIMS OF PRIORITY

[0001] This patent application claims priority from:

(1) U.S. Provisional patent application No. 60/783,226, titled 'Trade identity licensing in a professional services environment with conflict' filed on Mar. 17, 2006.

(2) U.S. Provisional patent application No. 60/817,470 titled 'Segmented services having a global structure of networked independent entities', filed Jun. 28, 2006.

(3) U.S. Provisional patent application No. 60/853,499, titled 'Method and apparatus of neighborhood expression and user contribution system' filed on Oct. 19, 2006.

(4) U.S. Provisional patent application No. 60/854,230 titled 'Method and apparatus of neighborhood expression and user contribution system' filed on Oct. 25, 2006.

FIELD OF TECHNOLOGY

[0002] This disclosure relates generally to the technical fields of communications and, in one example embodiment, to a method, apparatus, and system of map based community search and neighborhood contribution.

BACKGROUND

[0003] A neighborhood may be a geographically localized community in a larger city, town, and/or suburb. Residents of the neighborhood may refer to each other as neighbors, although this term may also be used across much larger distances in rural areas. In theory, the neighborhood may be small enough that the neighbors may be able to know each other by walking and/or driving a short distance (e.g., 5 miles) around their place of residence and/or their place of work. However, in practice, the neighbors may not know one another very well (e.g., because of busy schedules, fenced communities, lack of effort, a lack of time, etc.).

[0004] The neighborhood may be given a designated status through a neighborhood association, a neighborhood watch group, a political group, a homeowners association, and/or a tenant association. These groups may help in matters such as lawn care and fence height, and they may provide such services as block parties, neighborhood parks, children activities, special interest groups, and/or community security. However, getting messages out to residents of the neighborhood may require expensive direct mail, and/or time consuming door to door meetings with residents of the neighborhood.

[0005] A neighborhood watch (e.g., a crime watch, a block watch, a neighborhood crime watch, etc.) may be an organization of active residents devoted to crime and/or vandalism prevention in the neighborhood. Members of the neighborhood watch may stay alert of unusual activity, behaviors, and/or crime in the neighborhood. However, most residents may not be active participants of the neighborhood association (e.g., because of a lack of time), and may be unaware of safety, security, and/or prevention issues in their immediate area.

[0006] For example, in many American communities, while a few active residents know a lot of their neighbors, there are far more residents who do not even know what professions, interests, and reputations are of their immediate

next-door neighbors. As a result, friendships among neighbors don't form as often, neighbors have more difficult time asking other neighbors for help, safety in the neighborhood suffers, quality of life is impacted, and a sense of community is diminishing.

SUMMARY

[0007] A method, apparatus and system of map based neighborhood search and community contribution are disclosed. In one aspect, a method includes associating a verified registered user with a user profile, associating the user profile with a specific geographic location, generating a map concurrently displaying the user profile and the specific geographic location, and simultaneously generating, in the map, wiki profiles associated with different geographic locations surrounding the specific geographic location associated with the user profile.

[0008] The method may also includes processing a query of at least one of the user profile and the specific geographic location and converting a particular wiki profile of the wiki profiles to another user profile when a different registered user claims a particular geographic location to the specific geographic location associated with the particular wiki profile, wherein the user profile is tied to a specific property in a neighborhood, and wherein the particular wiki profile is associated with a neighboring property to the specific property in the neighborhood.

[0009] The method may further include delisting a certain wiki profile of the wiki profiles when a private registered user claims a certain geographic location adjacent to at least one of the specific geographic location and the particular geographic location and masking the certain wiki profile in the map when the certain wiki profile is delisted through the request of the private registered user. Moreover, the method may include processing a tag data associated with at least one of the specific geographic location, a particular geographic location, and/or the delisted geographic location, displaying a frequent one of the tag data when the specific geographic location and/or the particular geographic location is made active, but not when a geographic location is delisted, permitting a commercial user to purchase a customizable business profile associated with a commercial geographic location, enabling the verified registered user to communicate a message to the neighborhood based on a selectable distance range away from the specific geographic location and/or processing a payment of the commercial user and the verified registered user.

[0010] Furthermore, the method may also include permitting the verified registered user to edit any information in the wiki profiles including the particular wiki profile and the certain wiki profile until the certain wiki profile is claimed by the different registered user and/or the private registered user, enabling a claimant of any wiki profile to control what information is displayed on their user profile and/or allowing the claimant to segregate certain information on their user profile such that only other registered users directly connected to the claimant are able to view data on their user profile.

[0011] Also, the method may include applying a first user ID with the verified registered user and a second user ID to the different registered user, connecting the verified registered user with the different registered user with each other through at least one of a geo-positioning data associated with the first user ID and the second user ID, setting a

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[0231] The social community module (e.g., as described in FIG. 1) may be a search engine (e.g., Google®, Yahoo®, etc.) that uses maps (e.g., satellite map views) instead of text displays to show information, user profiles, reviews, promotions, ads, directions, events, etc. relevant to user searches.

[0232] The example systems and methods illustrated in FIGS. 1-28 may facilitate a social network membership that spreads virally by users inviting their friends. For example, every person that registers has their own profile, but registration may not be required to contribute content. However, registration may be required to "own" content on your own home, and have override permission to delete things that you don't like about yourself listed about you by others. In one embodiment, the social community module may need to confirm the user's identity and address (e.g., using digital signature tools, drivers license verification, etc.), and/or the user may need to pay a monthly fixed fee (e.g., through a credit card) to control their identity.

[0233] For example, they can get a rebate, and not have to pay the monthly fee for a particular month, if they invite at least 15 people that month AND contribute information about at least 10 of their neighbors, friends, civic, or business locations in their neighborhood. People can post pics of their family, their business, their home, etc. on their profile once they "own" their home and register. In another embodiment, endorsements for neighbors by others will be published automatically. People can search for other people by descriptors (e.g., name, profession, distance away from me, etc.)

[0234] Profiles of users may be created and/or generated on the fly, e.g., when one clicks on a home.

[0235] People may be able to visually see directions to their neighborhood businesses, rather than reading directions through text in a first phase. After time, directions (e.g., routes) can be offered as well. Users can leave their opinions on businesses, but the social community module also enables users to leave opinions on neighbors, occupants or any entity having a profile on the map display. The social community module may not attempt to restrict freedom of speech by the users, but may voluntarily delete slanderous, libelous information on the request of an owner manually at any time.

[0236] In one embodiment, the methods and systems illustrated in FIGS. 1-28 enable people to search for things they want e.g. nearby pizzas etc. (e.g., by distance away). Advertisers can "own" their listing by placing a display ad on nextdoor.com. Instead of click-through revenues when someone leaves the site, revenues will be realized when the link is clicked and someone views a preview hml on the right of the visual map. Targeted advertisements may also be placed when someone searches a particular street, name, city, etc.

[0237] In another example embodiment, the social community module may enable users of the social network to populate profiles for apartments, buildings, condos, etc. People can create floors, layout, etc. of their building, and add social network pages on the fly when they click on a location that has multiple residents, tenants, or lessees.

[0238] A user interface associated with the social community module 100 may be clean, simple, and uncluttered (e.g., Simple message of "get to know your neighbors"). For example, the map interface shows neighbors. Methods and systems associated with the features described may focus on

user experience, e.g., ensuring a compelling message to invite friends and/or others to join. A seed phase for implementation of the methods and systems illustrated in FIGS. 1-28 may be identified for building a membership associated with the social community module.

[0239] For example, a user having extensive networks in a certain area (e.g., a city) may seed those communities as well. The social network may encourage user expression, user content creation, ease of use on site to get maximum users/distribution as quickly as possible. In another embodiment, the social community module may ensure that infrastructure associated with operation of the social community module (e.g., servers) are able to handle load (e.g., data traffic) and keep up with expected growth.

[0240] For example, the user interface view illustrated in the various figures shows an example embodiment of the social community module of FIG. 1. The user interface view may include a publicly editable profile wall section allowing public postings that owners of the profile can edit. For example, any user may be able to post on an empty profile wall, but a user must claim the location to own the profile (e.g., may minimize barriers to users posting comments on profile walls).

[0241] Names featured on the profile wall may be links to the user profiles on the map (e.g., giving an immediate sense for the location of admirers (or detractors) relative to user location). In one embodiment, an action (e.g., mouse-over) on a comment would highlight the comment user's house on the map and names linking to user profiles. The user interface view may also utilize the mapping interface to link comments to locations.

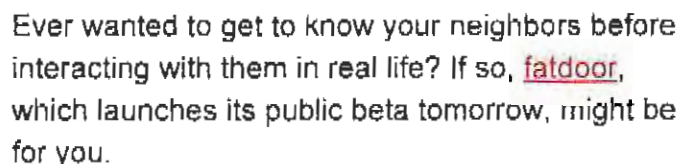
[0242] For example, the various embodiments illustrate a comment announcing a garage sale, that is tied to a mappable location on the mapping interface. (e.g., allows people to browse references directly from people's profiles). In the various figures, an example display of the mapping interface is illustrated. In this example display, houses are shown in green, a church is shown in white, the red house shows the selected location and/or the profile owner's house, question marks indicate locations without profile owners, blue buildings are commercial locations, and the pink building represents an apartment complex.

[0243] Houses with stars indicate people associated with (e.g., "friends") of the current user. In one embodiment, a user action (e.g., mouse-over) on a commercial property displayed in the mapping interface may pull up a star (e.g., ****) rating based on user reviews, and/or a link to the profile for the property. A mouse-over action on the apartment complex may pull up a building schematic for the complex with floor plans, on which the user can see friends/profiles for various floors or rooms. Question marks indicated in the display may prompt users to own that profile or post comments on the wall for that space. A user action on any house displayed in the mapping interface may pull up a profile link, summary info such as status, profession, interests, etc. associated with the profile owner, a link to add the person as a friend, and/or a link to send a message to the user (e.g., the profile owner).

[0244] In another embodiment, a default profile view shown is that of the current user (e.g., logged in), and if the user clicks on any other profile, it may show their profile in that space instead (with few text changes to indicate different person). The events in your area view of the profile display in may have a default radius for notification of events (e.g.,

EXHIBIT E

May 28, 2007 | Dan Kaplan



Fatdoor takes phone book data from companies like [InfoUSA](#) and mashes it up with Microsoft Virtual Earth, mapping people to their own homes and creating pre-populated visualizations of entire neighborhoods. (see screenshot below). It combines standard social networking functionality and a wiki that lets you (or your neighbors and friends!) fill out your profile. It registers your immediate geography, and so makes it easy to find like-minded people a street or two away.



Fatdoor will start out covering Silicon Valley and spread outward, so if you live in the Valley, chances are you're already on the site. In its current form, fatdoor is an opt-out system: If you are in the phone directory, it creates a basic profile for you, and by default, this profile is a wiki that can be edited by your neighbors whether you are aware of fatdoor or not. (You can change this once you've signed up) Fatdoor lists the names of anyone who edits a profile, which it hopes will deter users from writing terrible things. But if someone pretends to be you and takes your profile before you, you have to submit proof of your identity — like a driver's license and utility bill — to get it back.



Individuals on the maps are represented by "pushpins" that look like toy figures from back in the day. Hover over one, and a window with a photograph (if one's been uploaded) and a link to that person's profile pops up.

Before you've gone to the site and registered, your pushpin stands at your address, which, like the rest of your neighborhood, is crisply rendered in a photographic bird's eye view. Afterwards, you can move the pushpin onto your house.

Your Fatdoor profile is standard for social networks: personal details, interests, jobs, and so on. You can create neighborhood groups and put them on the map, post shout-outs on a community page and check out listings for local events. Fatdoor also aggregates real-estate information, so you can see whose houses are for sale and for how much. For now, at least, fatdoor does not host videos or photographs. We're not certain how this site will make money, but perhaps targeted local advertising and real estate information will work.

My Neighborhood



The interface is clean and simple. The alpha version that we saw in a demo covered only a small part of Cupertino, CA. It had a neighborhood feel, with a page that highlights groups like the "Parent's Babysitting Exchange," and the "Kiwanis Club of Cupertino." That being said, while it looks great for suburban neighborhoods, fatdoor will have serious challenges when tackling cities like San Francisco and New York. I, for example, live in Manhattan and have around 240 neighbors in my building and thousands right next door. It's hard to imagine how the current interface will deal with this kind of density, but fatdoor's CTO, Chandu Thota, formerly the Lead Developer of Microsoft's Virtual Earth, knows lots about visualization, so we'll have to wait and see.

The Palo Alto company has raised \$1 million from private investors Bill Harris, former CEO of PayPal and Intuit, and Jeff Drazan of Bertram Capital.

[illegible]

EXHIBIT F

Mashable

FatDoor Launches Social Network for Your Neighborhood

May 28, 2007 by [Kristen Nicole](#)



[FatDoor](#) has been under wraps for some time now, but has launched its alpha version at the Where 2.0 Conference in San Jose. See our [Where 2.0 Conference](#) roundup for information on the other attendees.

FatDoor is a way to get to know your neighbors on a very local level, and displays information over a Microsoft Virtual Earth map that can toggle between 2D and 3D views. It's like a Wikipedia for the White Pages. FatDoor isn't limited to people, though.

Information regarding your local businesses, events, shopping deals and organizations are accessible using FatDoor as well.

And this information can be modified by the users in the community, adding images, descriptions, addresses (not for residences) and groups. If a neighbor hasn't been to FatDoor to "claim" their location, their icon will be shown on the street as opposed to their house, and you can leave messages for them that they will see once they've signed up to use the site. You can invite users to FatDoor with their email address or their street address.

Local business information will include reviews and additional items gathered from all over the web. Any contributions from other FatDoor users will enable you to see their profile directly. Nearby businesses, organizations, etc. will show as well, so you can see what other things there are to do in the area. The more you contribute to the site, the more points you earn, which increases your validity as a FatDoor user. Hopefully users won't abuse the system, but as we've seen with Wikipedia, communities such as these are self-regulating.

If the access to personal information coupled with the high potential for a lack of control over what's shown on FatDoor scares you, you're not alone. FatDoor ushers in a high level of transparency that many will be uncomfortable with, especially if there are no age restrictions for registrants. While this is only slightly more of a concern with FatDoor than with Wikipedia, it is a concern nonetheless.

My Neighborhood



All activity is also highlighted

Accountant All Day Attorney Association Art Artistes Automobiles Books

Books Cars CDD Charity Cities Clubs Computers

entrepreneurship Environment Family Fashion Gardening Golf

government History Housing Insurance Law Lawyer Magazine Media

Charity
Environment

Pending friend/family requests

0/0 No friend/family pending requests

Group Requests

0/0 No group requests pending requests

Neighborhood Comments



Parents Submitting Comments of Argentine

This group of the Parents of Argentine want to see a change made to the law to help with parents in the neighborhood taking action against the school to have a parent's right to sue a school for about 1000 children in the



Members of Argentine Chamber of Commerce

The Argentine Chamber of Commerce is a non-profit organization of 1000 members who are active in the 1000 people. The chamber collaborates with government agencies and private industry to assist and strengthen the business enterprise.



Parents Club of Argentine

www.argentinaclub.com.ar

Explore Neighborhood

Show Neighbors Map



EXHIBIT G



Fatdoor CEO Talks About Balancing Security With Community

With all the commotion about everything that's visible on Google's StreetView, there seems to be a lot of justifiable paranoia associated with the swiftly evolving map tools on the market. Likewise, there's been a lot of speculation as to how security and privacy are going to be dealt with on the social networking sites that draw information from these web apps.

I saw this at work earlier this week with the announcement of the alpha launch of social networking site Fatdoor at Where 2.0. As if the standard security issues aren't tricky enough when it comes to the average site, Fatdoor's mashup of Live Earth aerial images with wiki versions of users' neighborhoods has a lot of hand wringing going on.



To address these issues I went straight to the source and had a chat with Fatdoor CEO Raj Abhyanker yesterday afternoon about the security protocols that the site has in place. A lot of the potential problems I posed in an earlier post are common concerns according to Abhyanker, but he assured me that he's done his homework.

"The thing that really gets people feeling uneasy is seeing an icon on the map. They instantly think that their icon is going to float over their actual street address, but that's not the case. . .we actually have less information displayed than Google's white pages," said Abhyanker.

It wasn't until Abhyanker let me take his neighborhood for a test drive that I started to understand how this actually plays out. Fatdoor is hardly the stalking tool we all feared. In fact, its simple interface made Abhyanker's own community fit together more like a wiki version of a town hall. Users in the neighborhood can broadcast general messages to the entire block, submit an entry about a local business, or even submit entries for friends and other neighbors. Abhyanker's neighborhood is even set up to elect moderators to help police this conduct too.

Paired with the amount of control the user has over how much or how little information the neighborhood can access about themselves, it actually seemed....pretty safe.

As far as peeking into other neighborhoods? Abhyanker has that covered too. "We've been playing around with the distance, and after some testing we've found that keeping it at a 5 mile radius [from the user's residence] is the most reasonable," he said. "It keeps the focus on the neighborhood and also keeps the feeling of community. Of course, this is something that we're going to have to change depending on the size and layout of a city, but during testing it seemed like the ideal distance."

With that said, it'll be interesting to see how Abhyanker's social experiment comes together. Although social networking sites like Myspace and Facebook are great for connecting people, few have attempted to tackle the relevance of building out the social networks right outside our doorsteps. Still, it's good to know that even though Abhyanker and his crew have decided to bring social networking a little closer to home, you can still draw the blinds every once in a while.